

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,)	
)	
Plaintiff,)	
)	C.A. No. 23-758 (JLH)
v.)	
)	
WIZ, INC.,)	
)	
Defendant.)	REDACTED - PUBLIC VERSION

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Pursuant to Section 8(g) of the Scheduling Order (D.I. 33, D.I. 90) and Section 3(a)(iii) of the Stipulation and Order Regarding Discovery of Electronically Stored Information (D.I. 71), Plaintiff Orca Security Ltd. and Defendant Wiz, Inc. respectfully move this Court to schedule a teleconference to address the following disputes.

Plaintiff Orca Security Ltd.'s Issue(s) For Teleconference:

1. Defendant's deficient responses to Orca's Interrogatory Nos. 4, 12, and 15;
2. Defendant's deficient responses to Orca's Requests for Production Nos. 91-95 and 110-113;
3. Defendant's failure to address deficiencies in its document production outstanding since June 26, 2024; and
4. Defendant's deficient production of documents and communications exchanged with or disclosed to [REDACTED] that are responsive to Orca's Requests for Production Nos. 16-23, 25-27, 38, 44, 49, 57, 68, 73, 95, 135, 154-55, 157, and 159-61.

Defendant Wiz, Inc.'s Issue(s) For Teleconference:

1. Plaintiff's deficient production of core technical documents pursuant to the Default Standard for Discovery, Including Discovery of Electronically Stored Information, ¶ 4.b;
2. Plaintiff's deficient responses to Wiz's Request for Production Nos. 71 and 72; and

3. Plaintiff's deficient responses to Wiz's Interrogatory Nos. 12 and 13.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in one or more verbal meet-and-confers by telephone on the following dates: July 9, 2024, August 2, 2024, August 14, 2024, and August 16, 2024.

Delaware Counsel:

- Orca: Jack Blumenfeld and Rodger Smith (Morris, Nichols, Arsht & Tunnell);
- Wiz: Fred Cottrell, Christine Haynes, and Kelly Farnan (Richards, Layton & Finger)

Lead Counsel:

- Orca: Blake Davis, Chris Henry, Krissy McKenna, Lucas Lonergan, Peter Hoffman, and Nicole Bruner (Latham & Watkins);
- Wiz: Caty Lacey, Lisa Zang, Praatika Prasad, Alex Miller, and Sachli Nayeri (Wilson Sonsini)

The parties are available for a teleconference on September 11, 2024, at 3:00 pm ET, i.e., the date and time the Court set for a teleconference to resolve other discovery disputes (D.I. 95), or the afternoons (ET) of September 13, 2024 or September 26, 2024; or will otherwise make themselves available at the Court's convenience.

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